UNITED STATES DISTRICT COURT



District of Kansas -

(Topeka Docket)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 24-40037-TC-RES

MEHAILJAH DANIELS (AKA GAINES),

Defendant.

SEALED INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

DOMESTIC VIOLENCE [18 U.S.C. § 2261(a)(1)]

On or about January 1, 2024, in the District of Kansas, upon and within the Fort Riley Military Installation, and thus in the special territorial jurisdiction of the United States as defined in 18 U.S.C. § 7(3), the defendant,

MEHAILJAH DANIELS (AKA GAINES)

did knowingly, willfully, intentionally, with the intent to injure, harass, or intimidate a

spouse, to wit: D.D., commit a crime of violence against that spouse, such as assault with a dangerous weapon.

All in violation of Title 18, United States Code, § 2261(a)(1).

COUNT 2

ASSAULT WITH A DANGEROUS WEAPON [18 U.S.C. § 113(a)(3)]

On or about January 1, 2024, in the District of Kansas, upon and within the Fort Riley Military Installation, and thus in the special territorial jurisdiction of the United States as defined in 18 U.S.C. § 7(3), the defendant,

MEHAILJAH DANIELS (AKA GAINES)

did knowingly, willfully, and intentionally commit the offense of assault with a dangerous weapon with the intent to do bodily harm to another, to wit: D.D., and that the defendant did so without just cause or excuse.

All in violation of Title 18, United States Code, § 113 (a)(3).

A TRUE BILL.

7/17 /2024 DATE

s/Foreperson

FOREPERSON OF THE GRAND JURY

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Ks. S. Ct. No. 24106

IT IS REQUESTED THAT THE TRIAL BE HELD IN TOPEKA, KANSAS

PENALTIES

Count 1 [Domestic Violence] [18 U.S.C. § 2261(a)(1)]

- A term of imprisonment not to exceed ten (10) years. 18 U.S.C. § 2261(b)(3).
- A fine not to exceed \$250,000.00.
 18 U.S.C. § 3571(b)(3).
- Or Both.
- A term of supervised release not to exceed three (3) years.
 18 U.S.C. § 3583(b)(2).
- A mandatory special assessment of \$100.00 per count of conviction.
 18 U.S.C. § 3013(a)(2)(A).

Count 2 [Assault with a Dangerous Weapon] [18 U.S.C. § 113(a)(3)]

- A term of imprisonment not to exceed ten (10) years. 18 U.S.C. § 113(a)(3).
- A fine not to exceed \$250,000.00.
 18 U.S.C. § 3571(b)(3).
- Or Both.
- A term of supervised release not to exceed three (3) years.
 18 U.S.C. § 3583(b)(2).
- A mandatory special assessment of \$100.00 per count of conviction.
 18 U.S.C. § 3013(a)(2)(A).